

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

CHRISTINE GLENN
511 West Federal Street
Niles, OH 44446

Plaintiff,

vs.

MICHELLE NICOLE FRENCHKO
160 High Street NW #5
Warren, OH 44481

and

TRUMBULL COUNTY
COMMISSIONERS
160 High Street NW #5
Warren, OH 44481

Defendants.

) CASE NO.

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) JUDGE

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) **COMPLAINT**

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) **(Jury Demand Endorsed Hereon)**

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Now comes Plaintiff Christine Glenn (“Plaintiff”), by and through counsel, and for her Complaint against Michelle Nicole Frenchko and the Trumbull County Commissioners, states as follows:

1. Plaintiff is a resident of Niles, Trumbull County, Ohio.
2. Defendant Michelle Nicole Frenchko (“Frenchko”) is a public officer and resident of Trumbull County, Ohio.
3. Defendant Trumbull County Commissioners (“The Commissioners”) is a government office in Trumbull County, Ohio.

4. The events giving rise to this matter occurred at 160 High Street NW #5, Warren, Trumbull County, Ohio 44481.

5. This Court has original jurisdiction over the claims in this Complaint pursuant to 28 U.S.C. §§ 1331 by Title VII of the Civil Rights Act of 1964.

6. This Court has personal jurisdiction over Defendants because they are residents of this judicial district.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(1) and (2).

8. Plaintiff is and at all relevant times was the administrative secretary for the Trumbull County Commissioners.

9. At all relevant times, Defendant Frenchko is and was a Trumbull County Commissioner.

10. On January 4, 2021, Frenchko took office as a Trumbull County Commissioner. Frenchko entered office with a list of employees she wanted to remove from their positions, including Plaintiff.

11. Frenchko told another County Commissioner that she was, “going to badger the old ones til they quit.”

12. Frenchko also made statements about Plaintiff specifically saying, “we need to get someone younger in that position who knows technology.”

13. Plaintiff was not told that there would be any changes to her duties when Frenchko took office. However, despite never being told of any new duties, Plaintiff was berated and harassed by Frenchko for not making changes.

14. Frenchko also harassed and abused Plaintiff for not syncing her email to her phone after being informed by the county IT department multiple times that it would not be possible.

15. Plaintiff has multiple comorbidities that put her at a higher risk for Covid-19 and was moved to another building to accommodate her. Despite Plaintiff's serious health risks, Frenchko tried to move her to another building where she would be working in closer proximity to other people.

16. Plaintiff is of Italian descent and was subjected to defamatory and derogatory statements made about Italian people by Frenchko.

COUNT ONE – AGE DISCRIMINATION

17. Plaintiff restates and incorporates herein the allegations in Paragraphs 1 through 16 of the Complaint.

18. Frenchko, in her capacity as a Trumbull County Commissioner, stated on multiple occasions that she was going to remove Plaintiff from her position because of her age.

19. Frenchko, in her capacity as a Trumbull County Commissioner, repeatedly made disparaging and abusive remarks to Plaintiff about her age and her being replaced.

20. Frenchko, in her capacity as a Trumbull County Commissioner, attempted to deny and revoke Plaintiff's reasonable accommodation during a global pandemic.

21. Plaintiff suffered physical and emotional damages as a result of Frenchko's hostile and abusive conduct as a result of her age.

COUNT TWO – ETHNIC DISCRIMINATION

22. Plaintiff restates and incorporates herein the allegations in Paragraphs 1 through 21 of the Complaint.

23. Frenchko, in her capacity as a Trumbull County Commissioner, made defamatory and offensive statements about people of Italian descent.

24. Plaintiff is a person of Italian descent and was subjected to a hostile and abusive work environment as a result of these statements.

25. Plaintiff suffered physical and emotional damages as a result of Frenchko's defamatory and offensive statements about people of Italian descent.

WHEREFORE, Plaintiff Christine Glenn requests the following relief be awarded in her favor and against Defendants, jointly and severally:

- a. Damages in excess of \$25,000, the full amount of which will be proven at trial, to cover all loss and damages to Plaintiff;
- b. Punitive damages;
- c. Court costs, expenses, and reasonable attorney fees; and
- d. For such other and further relief as the Court may deem just and proper.

JURY DEMAND

Pursuant to the Ohio Rules of Civil Procedure, Plaintiff demands a trial by jury on any and all issues set forth in this Complaint to the maximum number of jurors permitted by law.

Respectfully submitted,

/s/ Dennis R. Fogarty

DENNIS R. FOGARTY (0055563)

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